

1 FRANK H. COFER III, ESQ.
Nevada Bar No. 11362
2 **COFER & GELLER, LLC**
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5 *Attorney for Defendant Karapetyan*

6 UNITED STATES DISTRICT COURT
7 FOR THE DISTRICT OF NEVADA

8 THE UNITED STATES OF AMERICA,

9 *Plaintiff,*

10 *vs.*

11 DEVIN THOMPSON and VAGE KARAPETYAN,

12 *Defendants.*

Case no. 2:16-cr-230-GMN-CWH

**DEFENDANT VAGE KARAPETYAN'S
UNOPPOSED MOTION AND [PROPOSED]
ORDER TO PERMIT DEFENDANT TO
TRAVEL TO THE STATE OF CALIFORNIA
FROM 11/23/2018 TO 11/25/2018**

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14 NOW COMES Defendant VAGE KARAPETYAN, by and through FRANK H. COFER III, ESQ.
15 of COFER & GELLER, LLC, and hereby moves this Honorable Court to temporarily permit
16 Defendant to travel to the State of California during the dates of 11/23/2018 to 11/25/2018
17 so that he may attend his niece Natalie Majaran's wedding ceremony.

18 This motion is unopposed by the U.S. Attorney's office and is unopposed by pretrial
19 services, and is made and based on all the papers and pleadings on file herein and the
20 declaration of counsel filed herewith.

21 RESPECTFULLY SUBMITTED this 21st day of November, 2018.

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23 COFER & GELLER, LLC

24 By: /s/ Frank Cofer

25 FRANK H. COFER III, ESQ. (NV #11362)
26 *Attorney for Defendant Karapetyan*
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DECLARATION OF COUNSEL

FRANK H. COFER III, ESQ., makes the following declaration:

1. I am an attorney licensed to practice law in all state courts in the State of Nevada, before the United States District Courts in the district of Nevada, and before the Ninth Circuit Court of Appeals.

2. I am retained to represent Defendant VAGE KARAPETYAN in the instant action and am making this declaration in support of DEFENDANT VAGE KARAPETYAN'S UNOPPOSED MOTION AND [PROPOSED] ORDER TO PERMIT DEFENDANT TO TRAVEL TO THE STATE OF CALIFORNIA FROM 11/23/2018 TO 11/25/2018 that is filed herewith. I have personal knowledge and am competent to testify to the matters stated herein.

3. I am informed and I believe that my client, Defendant VAGE KARAPETYAN, wishes to travel to North Hollywood, California in order to attend his niece Natalie Majaran's wedding ceremony dates 11/23/2018 to 11/25/2018. However, his current conditions of release prohibit him from traveling outside of the State of Nevada.

4. My office has communicated with U.S. Pretrial Services employee Kelly Bowen (responsible for supervising the defendant) and AUSA ROBERT KNIEF (responsible for prosecuting this case) regarding this matter. Both of these individuals have stated that they have no opposition to the instant motion.

5. I declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing is true and correct except as to those matters stated herein upon information and belief.

EXECUTED on November 21st 2018 at Las Vegas, Nevada.

COFER & GELLER, LLC

By: /s/ Frank Cofer

FRANK H. COFER III, ESQ. (NV #11362)
Attorney for Defendant Karapetyan

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ORDER

THIS MATTER having come before the Court via an unopposed motion, and good cause appearing therefor,

IT IS HEREBY ORDERED that the conditions of pretrial release as to Defendant VAGE KARAPETYAN are temporarily modified in order to permit him to travel to the State of California during and throughout the following dates only: Friday, November 23, 2018 through Sunday, November 25, 2018.

DATED December 4, 2018, nunc pro tunc
November 21, 2018

By: 

UNITED STATES DISTRICT / MAGISTRATE JUDGE

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DEFENDANT VAGE KARAPETYAN'S UNOPPOSED MOTION AND [PROPOSED] ORDER TO PERMIT DEFENDANT TO TRAVEL TO THE STATE OF CALIFORNIA FROM 11/23/2018 TO 11/25/2018

By: /s/ April Burt
APRIL B. BURT
An employee of COFER & GELLER, LLC